

## Next Generation Text Relay Approval of a text relay service

### Response by KCOM

10 January 2014

The design of the Next Generation Text Relay Service (NGTS) to be provided by BT is extremely important to CPs given that it is the only service available which will enable CPs to meet their regulatory obligations under General Condition 15.5.

We were not aware of the detail of how NGTS would be provided until publication of Ofcom's consultation and have therefore had limited time to consider the implications of what BT is proposing. We believe that operationally the enhanced service should provide little in the way of challenges however provide comments below on key issues relating to TextNumbers and customer communication regarding the new service and its features.

#### TextNumbers

Our understanding is that TextNumbers are designed to be a centrally managed network independent solution and that the only requirement on CPs will be to ensure that calls made to TextNumbers route to the NGTS. Ofcom has allocated the number block 0330 670 to BT's Text Relay Service for use with NGTS and an 07777 number block is also to be allocated for use with mobile devices and we do not believe that there will be any issues with routing of the calls as required.

As an observation, if another provider wished to enter the market and offer a competing NGTS we believe it would be extremely difficult for them to manage the allocation of TextNumbers on a different basis than that proposed by BT. In particular, a provider who is not a CP may well be reluctant to become involved in the management of a number allocation in this way which may present a barrier to alternative providers entering the market.

#### Customer Communication

We welcome BT's intention to provide a website which provides customers with details of service features and how it works. However, we are concerned about the understanding of TextNumbers from a customer perspective. It will require the relay user (and their friends and family) to recognise and understand that there is a telephone number (from the 03 or 07 range) that effectively operates in parallel to their own geographic landline number and which is not allocated to them by their service provider. Customers may be unclear about who to contact should they experience any difficulties using TextNumbers.





**KCOM Group PLC**

We would welcome the opportunity to review proposed communications the service and in particular TextNumbers ahead of launch. This will enable other CPs to ensure that they are comfortable with the explanation provided and that their own messaging is consistent with that of BT. We would also suggest that Ofcom has a role to play in communicating details of NGTS to consumers.



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